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Counsel for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL EXHIBITS TO
AND PORTIONS OF MOTION TO
EXCLUDE ONE OF THREE
OPINIONS PROFFERED BY
WAYMO EXPERT JIM TIMMINS**

Judge: Hon. William H. Alsup
Trial Date: October 10, 2017

Pursuant to N.D. Cal. Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (collectively, “Uber”) submit this administrative motion for an order to file under seal portions of and the exhibit to Uber’s Motion to Exclude One of Three Opinions of Waymo Expert Jim Timmins (“Motion to Exclude”). Specifically, Uber requests an order granting leave to file under seal the confidential portions of the following:

Document	Portions to Be Filed Under Seal	Designating Party
Motion to Exclude	Yellow – highlighted portions	Sandstone Group and Tyto LiDAR
Exhibit 1	Entire Document	Waymo, Sandstone Group LLC, and Tyto LiDAR LLC

Waymo designated the entirety of Exhibit 1 as “Highly Confidential -- Attorneys’ Eyes Only.” (Goodman Decl. ISO Uber’s Administrative Motion to File Under Seal, ¶ 3.) Exhibit 1 also contains information that has been designated as confidential by non-parties Sandstone Group, LLC, and Tyto LiDAR, LLC. (*Id.* ¶ 4.)

Uber seeks to seal these documents because they contain information that Waymo and third parties have designated confidential and/or highly confidential. The redacted portions of Uber’s Motion to Exclude contain information discussing Exhibit 1 and their sealing is justified for the same reasons. (*Id.* ¶ 5.)

Pursuant to Civil Local Rule 79-5(d)(2), Uber will lodge with the Clerk the documents at issue, with accompanying chamber copies. Uber served Waymo with this motion on September 16, 2017.

Dated: September 16, 2017

BOIES SCHILLER FLEXNER LLP

By: /s/ Karen L. Dunn
Karen L. Dunn

Counsel for Defendants
UBER TECHNOLOGIES, INC. AND
OTTOMOTTO LLC